

WADE KILPELA SLADE LLP

Gillian L. Wade, State Bar No. 229124
gwade@waykayslay.com
Sara D. Avila, State Bar No. 263213
sara@waykayslay.com
Marc A. Castaneda, State Bar No. 299001
marc@waykayslay.com
2450 Colorado Ave., Suite 100E,
Santa Monica, CA 90404
Telephone: (310) 667-7273
Facsimile: (424) 276-0473

**MILSTEIN JACKSON FAIRCHILD
& WADE, LLP**

Mark A. Milstein, State Bar No. 155513
mmilstein@mjfwlaw.com
2450 Colorado Ave., Ste. 100E
Santa Monica, California 90404
Tel: (310) 396-9600
Fax: (310) 396-9635

*Attorneys for Plaintiffs individually and
on behalf of all others similarly situated*

WADE KILPELA SLADE LLP

David Slade
slade@waykayslay.com
1 Riverfront Place, Suite 745,
North Little Rock, AR 72114
Telephone: (501) 417-6445
Facsimile: (424) 276-0473

wh LAW

Brandon Haubert
brandon@wh.law
Jessica Hall
jessica@wh.law
1 Riverfront Place, Suite 745
North Little Rock, AR 72114
Telephone: 501.891.6000
Facsimile: 501.222.3027

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

SHANNON IRELAND-GORDY and
STEPHANIE IRELAND GORDY, MELISSA
BROAD, and JANE DOE individually and on
behalf of all others similarly situated,

Plaintiffs,

v.

TILE, INC., LIFE360, INC., and
AMAZON.COM, INC.,

Defendants.

Case No. 3:23-CV-04119-RFL

**DECLARATION OF MARC A.
CASTANEDA IN SUPPORT OF
PLAINTIFFS' MOTION TO PROCEED
UNDER A PSEUDONYM AS TO JANE
DOE**

Hearing Date: September 17, 2024
Hearing Time: 10:00 a.m.
Judge: Rita F. Lin
Dept. 15

1 I, Marc A. Castaneda, hereby declare as follows:

2 1. I am admitted to the bar of this state and am an associate at Milstein Jackson
3 Fairchild & Wade, LLP (“MJFW”), counsel of record for Plaintiffs Shannon Ireland-Gordy,
4 Stephanie Ireland Gordy, Melissa Broad, and Jane Doe (“Plaintiffs”). I have personal knowledge
5 of the facts set forth in this declaration, and, if called as a witness, could and would competently
6 testify thereto under oath.

7 2. This declaration is submitted in support of Plaintiffs’ Motion to Proceed Under a
8 Pseudonym as to Jane Doe, filed concurrently herewith.

9 3. Attached as “Exhibit A” is a true and correct copy of an email I received from Jeffrey
10 M. Gutkin, counsel of record for Defendants Tile, Inc. and Life360, Inc. (“Defendants”) on July
11 22, 2024.

12 I declare under the penalty of perjury that the foregoing is true and correct and that this
13 declaration was executed on this 2nd day of August, 2024 in Los Angeles, California.

14 
15 _____
16 Marc A. Castaneda

EXHIBIT A

RE: Activity in Case 3:23-cv-04119-RFL Ireland-Gordy et al v. Tile, Inc. et al Administrative Motion to File Under Seal

Gutkin, Jeff <jgutkin@cooley.com>

Mon 7/22/2024 4:03 PM

To: David Marin <dmarin@mjfwlaw.com>; Bernstein, Max A. <mbernstein@cooley.com>; Chapman, Ellie (SEA) <EChapman@perkinscoie.com>; Sipos, Charles (SEA) <CSipos@perkinscoie.com>; LeBlanc, Travis <tleblanc@cooley.com>; Main, Amanda <amain@cooley.com>; Asthana, Aditi <AAsthana@cooley.com>; Gillian Wade <gwade@mjfwlaw.com>; David F. Slade <slade@wh.law>

Cc: Sara Avila <savila@mjfwlaw.com>; Marc Castaneda <mcastaneda@mjfwlaw.com>

Gillian and team –

I'm writing in connection with Jane Doe's use of a pseudonym in the Amended Complaint and the motion to seal her name that you filed last week. It is our understanding that, in the Ninth Circuit and this district, a plaintiff who wishes to proceed pseudonymously files a motion to do so concurrent with, or soon after, their complaint. *See, e.g., Yeh v. Mayorkas*, No. 4:24-CV-00797-KAW, 2024 WL 2263392, at *1 (N.D. Cal. Apr. 22, 2024); *Jane Roes 1-2 v. SFBSC Mgmt., LLC*, 77 F. Supp. 3d 990, 992 (N.D. Cal. 2015). Can you please let us know when you intend to file such a motion or if you have some other intention for addressing this question?

We consider a motion to proceed under a pseudonym, as compared to a sealing motion concerning a declaration, the proper context to resolve this issue. We will be able to formulate our position once Plaintiff Doe files a motion that sets out the reasoning and authority on which Plaintiff Doe relies. For now, we do not intend to oppose your sealing motion, but please do not interpret our non-opposition as a waiver of any rights.

Thank you.

From: David Marin <dmarin@mjfwlaw.com>

Sent: Thursday, July 18, 2024 3:55 PM

To: Bernstein, Max A. <mbernstein@cooley.com>; Chapman, Ellie (SEA) <EChapman@perkinscoie.com>; Sipos, Charles (SEA) <CSipos@perkinscoie.com>; Gutkin, Jeff <jgutkin@cooley.com>; LeBlanc, Travis <tleblanc@cooley.com>; Main, Amanda <amain@cooley.com>; Asthana, Aditi <AAsthana@cooley.com>

Cc: Gillian Wade <gwade@mjfwlaw.com>; Sara Avila <savila@mjfwlaw.com>; Marc Castaneda <mcastaneda@mjfwlaw.com>; David F. Slade <slade@wh.law>

Subject: RE: Activity in Case 3:23-cv-04119-RFL Ireland-Gordy et al v. Tile, Inc. et al Administrative Motion to File Under Seal

[External]

Dear Counsel,

Attached please find a copy of the unredacted declaration of Jane Doe. This is an exact copy of the file served on Monday, July 15, 2024.

Please let me know if you have any questions.

Thank you,

David Marin

*Paralegal to Gillian L. Wade, Esq., Sara D. Avila, Esq.,
and Marc A. Castaneda, Esq.*

MILSTEIN JACKSON FAIRCHILD & WADE, LLP

2450 Colorado Avenue

Suite 100E

Santa Monica, CA 90404

Tel: (310) 396-9600, ext. 149

Fax: (310) 396-9635
dmarin@mjfwlaw.com
www.mjfwlaw.com

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From: ECF-CAND@cand.uscourts.gov <ECF-CAND@cand.uscourts.gov>

Sent: Thursday, July 18, 2024 3:42 PM

To: efiling@cand.uscourts.gov

Subject: Activity in Case 3:23-cv-04119-RFL Ireland-Gordy et al v. Tile, Inc. et al Administrative Motion to File Under Seal

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U.S. District Court

California Northern District

Notice of Electronic Filing

The following transaction was entered by Wade, Gillian on 7/18/2024 at 3:41 PM and filed on 7/18/2024

Case Name: Ireland-Gordy et al v. Tile, Inc. et al

Case Number: [3:23-cv-04119-RFL](#)

Filer: Melissa Broad
Jane Doe
Stephanie Ireland Gordy
Shannon Ireland-Gordy

Document Number: [43](#)

Docket Text:

[Administrative Motion to File Under Seal Declaration of Jane Doe](#) filed by Melissa Broad, Jane Doe, Stephanie Ireland Gordy, Shannon Ireland-Gordy. (Attachments: # (1) Declaration of David Slade in Support of Plaintiffs' Administrative Motion to File Under Seal, # (2) Redacted Declaration of Jane Doe, # (3) Unredacted Declaration of Jane Doe, # (4) Proposed Order)(Wade, Gillian) (Filed on 7/18/2024)

3:23-cv-04119-RFL Notice has been electronically mailed to:

Amanda Alison Main amain@cooley.com, jcorrell@cooley.com

Charles Christian Sipos csipos@perkinscoie.com, docketSEA@perkinscoie.com

Gillian Leigh Wade gwade@mjfwlaw.com, dmartin@mjfwlaw.com, lholfield@waykayslay.com

Jeffrey Gutkin gutkinjm@cooley.com, carol-dickerson-7279@ecf.pacerpro.com, efiling-notice@ecf.pacerpro.com, eFilingNotice@cooley.com, john-brocales-7263@ecf.pacerpro.com

Marc Alexander Castaneda mcastaneda@mjfwlaw.com, dmartin@mjfwlaw.com

Max Bernstein , Esq mbernstein@cooley.com, efiling-notice@ecf.pacerpro.com, efilingnotice@cooley.com, mmagana@cooley.com

Sam Blankenship sblankenship@cgsh.com

Sara Dawn Avila savila@mjfwlaw.com, dmartin@mjfwlaw.com

Travis LeBlanc tleblanc@cooley.com, avera@cooley.com, efiling-notice@ecf.pacerpro.com, efilingnotice@cooley.com

3:23-cv-04119-RFL Please see [Local Rule 5-5](#); Notice has NOT been electronically mailed to:

The following document(s) are associated with this transaction:

Document description:Main Document

Original filename:C:\fakepath\2024-7-18 Administrative Motion to File Under Seal (for filing).pdf

Electronic document Stamp:

[STAMP CANDStamp_ID=977336130 [Date=7/18/2024] [FileNumber=21492141-0]
[130098e7e393fe6809758b8a8f70416864af6724259ad668aa217799c0a0a9d1255d
d885f0119159fa935e8b995a956b4f37baa9a3af882e73291eaa50117e36]]

Document description:Declaration of David Slade in Support of Plaintiffs' Administrative Motion to File Under Seal

Original filename:C:\fakepath\2024-7-18 Declaration of David Slade ISO Motion to File Under Seal (for filing).pdf

Electronic document Stamp:

[STAMP CANDStamp_ID=977336130 [Date=7/18/2024] [FileNumber=21492141-1]
[23cc9d3048da5fbceae8f9d3153ddd16021ba9c83d186596046896a2db1600a95301
16ae6e764e77e466935fb46d87799152f0973bb7950caacf47a7eda85f43]]

Document description: Redacted Declaration of Jane Doe

Original filename:C:\fakepath\Exhibit 1- Redacted 2024-7-12 Declaration of Jane Doe (for filing).pdf

Electronic document Stamp:

[STAMP CANDStamp_ID=977336130 [Date=7/18/2024] [FileNumber=21492141-2]
[2f8f6c807cba2a3e044aa0f6fd21df3dad9a4270b888ba3e4d1db94360df95299f26
5ddb1267f2bc12c2393071b1c0d02b9624767b9f16d848ce7c0b894ff03]]

Document description: Unredacted Declaration of Jane Doe

Original filename:C:\fakepath\Exhibit 2 - Unredacted 2024-7-12 Declaration of Jane Doe.pdf

Electronic document Stamp:

[STAMP CANDStamp_ID=977336130 [Date=7/18/2024] [FileNumber=21492141-3]
[000d363b27953fba76b9a60395bb9492837ebdb09d46fe2ad29a1cbeaef01a36f47f
288b31580652a7d88f63a5e95c42d423d2d2a02525a7b34eb04c9ec351ed]]

Document description:Proposed Order

Original filename:C:\fakepath\2024-7-18 Proposed Order.pdf

Electronic document Stamp:

[STAMP CANDStamp_ID=977336130 [Date=7/18/2024] [FileNumber=21492141-4]

[115056e887bb4810724df9063543f5f888bbd94cfe4230c5ce22b3b49a5f299c0e08
74f500b61bee797f50bd1681fc4f2a15844bfbcb88387b755bf564b7c16f5]]

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